

3. No substantive responses were provided by any Defendant as to any discovery request.
4. Not a single document was produced, nor was a single commitment to produce any document(s) provided.
5. Defendants' general objections and their rote, boilerplate objections are improper.
6. As demonstrated in Plaintiffs' Memorandum filed in support of this Motion, Defendants even concede that they have refused to provide any "meaningful, substantive" (Defendants' own words) responses to Plaintiffs' Discovery.
7. Furthermore, Defendants have also refused to meet and confer with Plaintiffs over the deficiencies in Defendants' discovery responses, stating that they will not do so until the Court has ruled on Defendants' Motion to Stay.
8. Defendants' conduct reveals that they have no intention of properly responding to discovery so long as the Motion to Stay is pending. Defendants Responses do not meet the spirit or the requirements of discovery provided by Rules 26, 33, 34, 36, and 37 of the Federal Rules of Civil Procedure and applicable case law.
9. Defendants' conduct flouts Defendants' obligations under the Federal Rules of Civil Procedure.
10. Plaintiffs are prejudiced in the prosecution of their claims by Defendants' conduct and refusals.
11. In support of this Motion, Plaintiffs submit the accompanying Plaintiffs Memorandum of Law and Declaration of John L. Wood.

WHEREFORE, for the reasons set forth above, and as are set forth in Plaintiffs' Memorandum of Law in support of their Motion to Compel Discovery Responses, and upon the grounds as shall be raised at oral argument of this Motion (if any), Plaintiffs ask this Court to enter an order compelling Defendants to respond to all of the outstanding discovery propounded by Plaintiffs without further

delay and hold that all of Defendants' respective objections to Plaintiffs' discovery requests, other than as to attorney-client privilege or work product protection, are deemed waived (or at the very least find that Defendants' general and boilerplate objections are waived.) Plaintiffs also ask this Court to grant them any additional and further relief to which the Court determines Plaintiffs are entitled under applicable authority.

Respectfully submitted,

Dated: February 15, 2021

By: /s/ John L. Wood

John L. Wood, Esq. (BPR #027642)
Cheryl G. Rice, Esq. (BPR #021145)
Rameen J. Nasrollahi, Esq. (BPR #033458)
EGERTON, McAFEE, ARMISTEAD & DAVIS, P.C.
900 S. Gay Street, Suite 1400
P.O. Box 2047
Knoxville, TN 37902
(865) 546-0500 (phone)
(865) 525-5293 (facsimile)
jwood@emlaw.com
crice@emlaw.com
masrollahi@emlaw.com

Dated: February 15, 2021

By: /s/ A. Matthew Ashley

A. Matthew Ashley (CA Bar. No. 198235)
Morgan Chu (CA Bar. No. 70446)
David Nimmer (CA Bar. No. 97170)
IRELL & MANELLA LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, California 90067-4276
(310) 277-1010 (phone)
(310) 203-7199 (facsimile)
mchu@irell.com
dnimmer@irell.com
mashley@irell.com

Attorneys for Plaintiffs
SNMP Research International, Inc.
SNMP Research, Inc.